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Ref: President's Council on Food Safety Strategic Plan  
Federal Register/ Vol. 64. No. 240/ December 15, 1999

The comments contained herein relate to the above matter and the resulting public hearing held January 19, 2000 in Washington, DC. These comments confirm, in part, testimony presented at the hearing on behalf of the Information Sharing and Data Collection (ISDC) Workgroup of the integrated National Food Safety System (NFSS) project.

We applaud the Council for integrating many concepts presented at the previous public hearing. By overhauling several key components of the Strategic Plan and reorganizing same into risk assessment, risk management and risk communication, many important state and local food safety agency concerns were addressed. With this important improvement in hand, we offer the following comments as additional enhancements deemed necessary to designing a fully functional plan.

First, the conscious decision to NOT include waterborne disease prevention in the Plan should be revisited. Although clearly stated within the first paragraph of the Federal Register notice, this purpose has not been adequately included except for reference to 'production water' on the farm. The FDA, in all its published model Food Codes, has always defined drinking water as "food." The EPA and the state agencies contracting with the EPA, in the vast majority of cases, do not exercise any oversight in the case of waterborne disease outbreaks resulting from contaminated drinking water. This responsibility falls to state and local agencies already charged with investigation of foodborne disease outbreaks. The agencies, disciplines, persons, principles, practices, hypotheses, laboratories and outcomes used in foodborne and waterborne disease outbreaks are almost always identical. Just as state and local food safety agencies promulgate regulations largely adopted from model regulations drafted by FDA/USDA, most state and local environmental quality agencies promulgate water safety regulations largely adopted from model regulations drafted by the EPA. However, when illnesses are reported from either food or water sources, it is incumbent on the state and local food safety agencies to investigate; not the EPA or the state environmental quality agencies. To wit: recall recent impacts of waterborne disease/death in Milwaukee, WI and Washington County, NY involved epidemiologists and sanitarians, not the EPA or their contract agencies. It may be "clean" to excise waterborne disease from the Plan if this is a "federal" plan but it arbitrary/capricious to do so if this is a "national" plan.

Second, the overarching goal is relatively complete except for three important components. The goal should be enhanced to include reference to surveillance, **outbreak/traceback** and the important feedback mechanism of consumer alerts/complaints. The present goal would otherwise indicate all food safety activities flow from regulatory/research/educational approaches. In addition to the easily recognized need to include surveillance and outbreak/traceback parameters, it is important to design and evaluate various feedback mechanisms (alerts/complaints) to ensure surveillance systems are dynamic and integrate consumer interests.

Third, several references appear throughout the plan relative to "data collection" capabilities. A fundamental feature of our Workgroup efforts has been to identify the greatest need does NOT exist with data collection but, rather, with "information sharing." We have found many food safety agencies collect data into literally hundreds of databases. The problem rests fundamentally with data dictionaries, common syntax, and on commonly used platforms so important information may be useful to a wider audience. It is suggested the Plan make reference to both data collection AND information sharing so as to be clear and focused.

Fourth, the three paragraph reference to the President's Food Safety Initiative on page 6-7 of the Plan addresses "integrated federal, state and local activities" and "surveillance," However, the six "Guiding Themes" that follow do not include references to either integration, e.g. data collection/sharing, or surveillance. This may have been an oversight but these two references do deserve inclusion in the guiding themes.

Fifth, page 9 of the Plan contains a reiteration of the overarching goal. This reiteration should again include reference to surveillance, **outbreak/traceback** and consumer alerts/complaints for reasons noted above.

Sixth, page 10 of the Plan, Science and Risk Assessment Goal, Objective 2 could be enhanced to ensure the goal includes data sharing which is listed in a following action item.

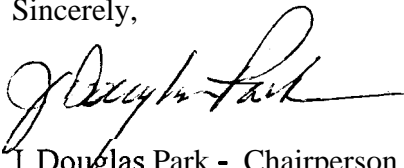
Seventh, page 15 of the Plan, Risk Management, Objective 4, first action item. State agencies presently experience great difficulty sharing responsibility for recalls with federal agencies. When federal agencies announce recalls but fail to inform states where recalled product may be shelved, the "proprietary information" shield means dangerous products may remain for sale and purchase by unsuspecting consumers. This issue is reportedly targeted and under scrutiny by USDA, FSIS. We strongly endorse a quick resolution to this issue to ensure COMPLETE recall information is shared, products are promptly removed, and consumers are protected.

Eighth, page 17 of the Plan, Risk Management, Objective 8, last action item. We heartily endorse the referenced electronic information system but note the only user group mentioned is public health. Users will include laboratorians as well as agriculture officials. Also, the information system reference should transcend outbreak data to include general food safety information sharing and, in addition, traceback data.

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Finally, comments were solicited in regard to various food safety organizational schemes. As our work group has not been tasked to specifically address this issue, we would not make specific selections. However, we note that state and local food safety agencies can best perform their respective functions when the system is "national", not simply "federal"; the respective empowerment and oversight is clear, unequivocal, transparent, participatory, supportive, **non-redundant**, consumer-oriented; and dialogue between state, local and federal food safety partners initiated in the last 1.5 years becomes a permanent feature of this partnership. A structure which addresses these needs will surely succeed. Thank you for this opportunity to comment.

Sincerely,



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